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JUL 22 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

CLERK OF DISTRICT COURT
SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA,

v.

BRADLEY JAMES MCCURDY,

Defendant.

Criminal No. 4:15-CR-00085

INDICTMENT

T. 18 U.S.C. § 2

T. 18 U.S.C. § 2251(a)

T. 18 U.S.C. § 2256

T. 18 U.S.C. § 2253

T. 18 U.S.C. § 2422(b)

THE GRAND JURY CHARGES:

COUNT 1

(Sexual Exploitation of a Child/Production of Child Pornography)

In approximately October 2014, in the Southern District of Iowa, defendant, BRADLEY JAMES MCCURDY, did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct, for the purpose of producing a visual depiction of such conduct, involving a minor male approximately 13 years old, and such visual depiction was transported or transmitted using any means or facility of interstate or foreign commerce or in and affecting interstate or foreign commerce.

This is a violation of Title 18, United States Code, Sections 2251(a), 2256, and 2.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

(Enticement/Attempted Enticement of a Minor to Engage in Illicit Sexual Activities)

In approximately October 2014, in the Southern District of Iowa and elsewhere, the defendant, BRADLEY JAMES MCCURDY, did use a facility of interstate and foreign commerce, to knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained

the age of 18 years to engage in sexual activities for which a person could be charged with a criminal offense, to wit, Sexual Abuse, in violation of Iowa Code Section 709.

This is a violation of Title 18, United States Code, Section 2422(b).

THE GRAND JURY FURTHER FINDS:

NOTICE OF FORFEITURE

If the defendant, BRADLEY JAMES MCCURDY is convicted of either of the offenses alleged in Counts 1 or 2 of this Indictment, the defendant shall forfeit to the United States his interest in the following property:

- a. Any and all visual depictions of minors engaging in sexually explicit conduct, including any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110.
- b. Any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

This is pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL.

/s/
FOREPERSON

Nicholas A. Klinefeldt
United States Attorney

By: /s/ Craig Peyton Gaumer
Craig Peyton Gaumer
Assistant United States Attorney